

# **EXHIBIT 109**

# **REDACTED**

**From:** HW CS Compliance  
**To:** Controlled Substances Compliance  
**CC:** Roxy Reed  
**Sent:** 1/15/2018 2:31:18 PM  
**Subject:** 6045 DEA SOM reports  
**Attachments:** DEA\_SOM\_Report\_6045.doc

Fax to: Office of Diversion Control  
Little Rock District Office  
(501) 217-6597

### **SUSPICIOUS ORDER REPORT**

Dear Office of Diversion Control:

Pursuant to our understanding and interpretation of the court decision in *Masters Pharmaceutical, Inc. v. Drug Enforcement Administration*, dated June 30, 2017, and as set forth more fully in our letter to you dated November 30, 2017, attached is a list of orders that Walmart's electronic Suspicious Order Monitoring (SOM) system has identified. As you will note from the list, Walmart's reviewed reporting process results in a much larger number of orders being reported to you. We will review these orders and will not ship any for which red flags cannot be resolved.

As previously state, we welcome the opportunity to discuss at your convenience whether DEA's interpretation of the *Masters* decision is consistent with ours, and to ensure that Walmart's SOM system meets DEA regulations. We look forward to hearing from you.

Please feel free to contact me if you have any other questions concerning this report.

Sincerely,  
Miranda Johnson, JD  
Director of Controlled Substances  
702 SW 8th Street  
Bentonville, AR 72716-0230  
Phone 479-273-4124  
Miranda.Burris@walmart.com

## DEA\_SOM\_Report\_6045

Store #	Order Date	Doses this order	NDC #	Active Ingredient	City State	DEA
3724	1/14/2018	100	00406-1144-01	METHYLPHENIDATE HYDROCHLORIDE		
7087	1/14/2018	200	00406-8330-01	Morphine Sulfate		
5763	1/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1259	1/14/2018	200	66993-0599-02	Amphetamine-Dextroamphetamine		
3291	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
3364	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
3796	1/14/2018	200	00406-8330-01	Morphine Sulfate		
5731	1/14/2018	100	00406-1010-01	OXYMORPHONE HYDROCHLORIDE		
203	1/14/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
3492	1/14/2018	200	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE		
451	1/14/2018	100	00781-2684-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
2766	1/14/2018	200	00406-5771-01	METHADONE HYDROCHLORIDE		
4182	1/14/2018	10	00406-9050-76	Fentanyl		
2958	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
4420	1/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
2436	1/14/2018	100	00406-8962-01	Dextroamphetamine Sulfate		
5092	1/14/2018	15	47781-0427-47	Fentanyl		
3146	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
5290	1/14/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
5290	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
3370	1/14/2018	100	00406-1860-01	METHYLPHENIDATE HYDROCHLORIDE		
6176	1/14/2018	200	00555-0974-02	Amphetamine-Dextroamphetamine		
3462	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
3803	1/14/2018	100	00093-5550-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
4132	1/14/2018	15	00406-9075-76	Fentanyl		
4472	1/14/2018	100	00406-8330-01	Morphine Sulfate		

6879	1/14/2018	200	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
282	1/14/2018	100	00406-8315-01	Morphine Sulfate
4644	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4644	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5082	1/14/2018	10	00406-9025-76	Fentanyl
3352	1/14/2018	100	00406-1810-01	METHYLPHENIDATE HYDROCHLORIDE
3803	1/14/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4458	1/14/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
4583	1/14/2018	200	42858-0802-01	Morphine Sulfate
176	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2170	1/14/2018	30	00406-8003-30	Morphine Sulfate
2225	1/14/2018	30	00406-8003-30	Morphine Sulfate
2282	1/14/2018	100	00591-2716-01	METHYLPHENIDATE HYDROCHLORIDE
2291	1/14/2018	300	00406-1144-01	METHYLPHENIDATE HYDROCHLORIDE
3013	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3168	1/14/2018	100	00406-8315-01	Morphine Sulfate
3168	1/14/2018	200	00406-8380-01	Morphine Sulfate
4376	1/14/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
4611	1/14/2018	400	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5692	1/14/2018	100	00406-8962-01	Dextroamphetamine Sulfate
6732	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
6953	1/14/2018	100	00093-5550-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
6960	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1313	1/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4115	1/14/2018	300	00406-8380-01	Morphine Sulfate
443	1/14/2018	200	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
452	1/14/2018	100	00228-3060-11	Amphetamine-Dextroamphetamine
504	1/14/2018	100	00406-8380-01	Morphine Sulfate



7156	1/14/2018	100	42858-0802-01	Morphine Sulfate
1308	1/14/2018	100	00093-5562-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
234	1/14/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
234	1/14/2018	100	00406-8962-01	Dextroamphetamine Sulfate
2405	1/14/2018	100	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
27	1/14/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
27	1/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
247	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
573	1/14/2018	100	00406-8959-01	Dextroamphetamine Sulfate
59	1/14/2018	100	00406-8320-01	Morphine Sulfate
9	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1265	1/14/2018	100	00406-1840-01	METHYLPHENIDATE HYDROCHLORIDE
237	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1291	1/14/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4679	1/14/2018	100	00093-5562-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
661	1/14/2018	100	00406-8315-01	Morphine Sulfate
773	1/14/2018	100	00406-8962-01	Dextroamphetamine Sulfate
1017	1/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2712	1/14/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
344	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4440	1/14/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
1044	1/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4423	1/14/2018	300	00406-8959-01	Dextroamphetamine Sulfate
5807	1/14/2018	200	42858-0003-01	OXYCODONE HYDROCHLORIDE
880	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2873	1/14/2018	30	00591-2717-30	METHYLPHENIDATE HYDROCHLORIDE

3094	1/14/2018	100	00406-8958-01	Dextroamphetamine Sulfate
3094	1/14/2018	100	00406-8961-01	Dextroamphetamine Sulfate
4494	1/14/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
616	1/14/2018	100	00406-8315-01	Morphine Sulfate
948	1/14/2018	100	00406-8330-01	Morphine Sulfate
1605	1/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3502	1/14/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
1552	1/14/2018	100	00781-2684-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1614	1/14/2018	15	00591-3214-72	Fentanyl
2397	1/14/2018	200	00406-5771-01	METHADONE HYDROCHLORIDE
4468	1/14/2018	800	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5290	1/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
564	1/14/2018	30	00591-2718-30	METHYLPHENIDATE HYDROCHLORIDE
5774	1/14/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE

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Phone 479-273-4124  
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## DEA\_SOM\_Report\_6045

Store #	Order Date	Doses this order	NDC #	Active Ingredient	City State	DEA
1489	2/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
2536	2/14/2018	200	00406-1010-01	OXYMORPHONE HYDROCHLORIDE		
3652	2/14/2018	100	00406-1144-01	METHYLPHENIDATE HYDROCHLORIDE		
3893	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1713	2/14/2018	30	00406-8003-30	Morphine Sulfate		
1876	2/14/2018	100	00406-8330-01	Morphine Sulfate		
2516	2/14/2018	300	42858-0001-01	OXYCODONE HYDROCHLORIDE		
2786	2/14/2018	100	00406-8959-01	Dextroamphetamine Sulfate		
5835	2/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1635	2/14/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1799	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
2452	2/14/2018	30	00591-2718-30	METHYLPHENIDATE HYDROCHLORIDE		
1082	2/14/2018	5	47781-0427-47	Fentanyl		
1605	2/14/2018	100	00406-1144-01	METHYLPHENIDATE HYDROCHLORIDE		
4333	2/14/2018	1,500	00555-0974-02	Amphetamine-Dextroamphetamine		
4333	2/14/2018	100	66993-0597-02	Amphetamine-Dextroamphetamine		
4333	2/14/2018	100	66993-0599-02	Amphetamine-Dextroamphetamine		
686	2/14/2018	100	00406-8958-01	Dextroamphetamine Sulfate		
3317	2/14/2018	100	00406-8959-01	Dextroamphetamine Sulfate		
3605	2/14/2018	100	00054-0235-25	Morphine Sulfate		
4148	2/14/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
7177	2/14/2018	100	00406-8958-01	Dextroamphetamine Sulfate		
1314	2/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1438	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		



2266	2/14/2018	100	00406-3332-01	HYDROMORPHONE HYDROCHLORIDE
3364	2/14/2018	10	00406-9025-76	Fentanyl
3328	2/14/2018	10	00406-9050-76	Fentanyl
3197	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3250	2/14/2018	300	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3434	2/14/2018	100	00406-8330-01	Morphine Sulfate
3893	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2065	2/14/2018	10	00406-9075-76	Fentanyl
5851	2/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
7179	2/14/2018	120	00591-2717-30	METHYLPHENIDATE HYDROCHLORIDE
7179	2/14/2018	23	62175-0490-64	Hydrocodone Polistirex
1701	2/14/2018	30	00591-3214-72	Fentanyl
4648	2/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5907	2/14/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
609	2/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
765	2/14/2018	200	00406-1830-01	METHYLPHENIDATE HYDROCHLORIDE
1940	2/14/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2131	2/14/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
21	2/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5341	2/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
69	2/14/2018	300	00406-8962-01	Dextroamphetamine Sulfate
801	2/14/2018	100	00406-8961-01	Dextroamphetamine Sulfate
86	2/14/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1967	2/14/2018	200	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2600	2/14/2018	100	00406-8380-01	Morphine Sulfate
2865	2/14/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
2832	2/14/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE



297	2/14/2018	100	00406-8380-01	Morphine Sulfate
3826	2/14/2018	10	47781-0428-47	Fentanyl
641	2/14/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
641	2/14/2018	100	00093-5550-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
202	2/14/2018	100	66993-0599-02	Amphetamine-Dextroamphetamine
2688	2/14/2018	100	00054-0235-25	Morphine Sulfate
371	2/14/2018	100	00093-5550-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
523	2/14/2018	200	00591-2716-01	METHYLPHENIDATE HYDROCHLORIDE
6300	2/14/2018	100	00406-1820-01	METHYLPHENIDATE HYDROCHLORIDE
1329	2/14/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
2689	2/14/2018	100	00406-1144-01	METHYLPHENIDATE HYDROCHLORIDE
3050	2/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1429	2/14/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
3750	2/14/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
415	2/14/2018	10	00591-3212-72	Fentanyl
2803	2/14/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
5094	2/14/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5353	2/14/2018	200	00093-5562-01	DEXMETHYLPHENIDATE HYDROCHLORIDE

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**To:** Controlled Substances Compliance  
**CC:** Roxy Reed  
**Sent:** 2/21/2018 2:33:52 PM  
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Miranda.Burris@walmart.com

## DEA\_SOM\_Report\_6045

Store #	Order Date	Doses this order	NDC #	Active Ingredient	City State	DEA
7004	2/20/2018	200	00406-8961-01	Dextroamphetamine Sulfate		
7004	2/20/2018	100	00406-8962-01	Dextroamphetamine Sulfate		
2646	2/20/2018	100	00406-8315-01	Morphine Sulfate		
7179	2/20/2018	100	00406-0512-01	OXYCODONE HYDROCHLORIDE		
7179	2/20/2018	23	62175-0490-64	Hydrocodone Polistirex		
7179	2/20/2018	200	00406-0523-01	OXYCODONE HYDROCHLORIDE		
4579	2/20/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1198	2/20/2018	100	00406-8315-01	Morphine Sulfate		
3391	2/20/2018	100	00406-8330-01	Morphine Sulfate		
68	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
278	2/20/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
2463	2/20/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE		
3225	2/20/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE		
6178	2/20/2018	100	00406-5771-01	METHADONE HYDROCHLORIDE		
3384	2/20/2018	5	47781-0426-47	Fentanyl		
5832	2/20/2018	100	00406-8959-01	Dextroamphetamine Sulfate		
3614	2/20/2018	100	00093-5562-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
5367	2/20/2018	200	00406-8315-01	Morphine Sulfate		
725	2/20/2018	10	47781-0424-47	Fentanyl		
4118	2/20/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
1363	2/20/2018	10	00406-9050-76	Fentanyl		
1363	2/20/2018	10	47781-0426-47	Fentanyl		
2794	2/20/2018	10	00591-3198-72	Fentanyl		
754	2/20/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		
5417	2/20/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE		

1033	2/20/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
2209	2/20/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
2266	2/20/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
2628	2/20/2018	30	00406-9075-76	Fentanyl
1661	2/20/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
5262	2/20/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2944	2/20/2018	100	00555-0972-02	Amphetamine-Dextroamphetamine
2886	2/20/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3803	2/20/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
4330	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5262	2/20/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
5262	2/20/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3990	2/20/2018	100	00406-8380-01	Morphine Sulfate
4619	2/20/2018	10	47781-0426-47	Fentanyl
5790	2/20/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2599	2/20/2018	10	00406-9025-76	Fentanyl
2599	2/20/2018	15	00406-9075-76	Fentanyl
4112	2/20/2018	10	00406-9075-76	Fentanyl
1974	2/20/2018	100	27808-0091-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2046	2/20/2018	200	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
4615	2/20/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5076	2/20/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1514	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2516	2/20/2018	200	00054-0235-25	Morphine Sulfate
2326	2/20/2018	300	00054-0235-25	Morphine Sulfate
3280	2/20/2018	100	00406-8380-01	Morphine Sulfate
401	2/20/2018	300	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE



2687	2/20/2018	100	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
2772	2/20/2018	100	00406-5771-01	METHADONE HYDROCHLORIDE
3425	2/20/2018	100	00781-2684-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3505	2/20/2018	200	00406-8330-01	Morphine Sulfate
1703	2/20/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2009	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2009	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
2357	2/20/2018	300	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4215	2/20/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5382	2/20/2018	100	00406-8315-01	Morphine Sulfate
3022	2/20/2018	100	00406-8390-01	Morphine Sulfate
3050	2/20/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
3050	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5828	2/20/2018	300	00406-8380-01	Morphine Sulfate
1072	2/20/2018	400	00406-5771-01	METHADONE HYDROCHLORIDE
2626	2/20/2018	100	43386-0860-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
889	2/20/2018	100	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE
1385	2/20/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1385	2/20/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1385	2/20/2018	300	00406-5755-01	METHADONE HYDROCHLORIDE
2397	2/20/2018	100	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE
2472	2/20/2018	100	00093-5552-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
5432	2/20/2018	20	00591-3198-72	Fentanyl
546	2/20/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
7326	2/20/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE



**From:** HW CS Compliance  
**To:** Controlled Substances Compliance  
**CC:** Roxy Reed  
**Sent:** 3/6/2018 4:58:33 PM  
**Subject:** 6045 DEA SOM reports  
**Attachments:** DEA\_SOM\_Report\_6045.doc

Fax to: Office of Diversion Control  
Little Rock District Office  
(501) 217-6597

### **SUSPICIOUS ORDER REPORT**

Dear Office of Diversion Control:

Pursuant to our understanding and interpretation of the court decision in *Masters Pharmaceutical, Inc. v. Drug Enforcement Administration*, dated June 30, 2017, and as set forth more fully in our letter to you dated November 30, 2017, attached is a list of orders that Walmart's electronic Suspicious Order Monitoring (SOM) system has identified. As you will note from the list, Walmart's reviewed reporting process results in a much larger number of orders being reported to you. We will review these orders and will not ship any for which red flags cannot be resolved.

As previously state, we welcome the opportunity to discuss at your convenience whether DEA's interpretation of the *Masters* decision is consistent with ours, and to ensure that Walmart's SOM system meets DEA regulations. We look forward to hearing from you.

Please feel free to contact me if you have any other questions concerning this report.

Sincerely,  
Miranda Johnson, JD  
Director of Controlled Substances  
702 SW 8th Street  
Bentonville, AR 72716-0230  
Phone 479-273-4124  
Miranda.Burris@walmart.com

## DEA\_SOM\_Report\_6045

Store #	Order Date	Doses this order	NDC #	Active Ingredient	City	State	DEA
3785	3/5/2018	30	27808-0082-01	Morphine Sulfate			
2266	3/5/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE			
769	3/5/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE			
5993	3/5/2018	100	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE			
3267	3/5/2018	200	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
2626	3/5/2018	100	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE			
718	3/5/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
2781	3/5/2018	100	00406-8315-01	Morphine Sulfate			
7246	3/5/2018	100	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
300	3/5/2018	100	00406-1830-01	METHYLPHENIDATE HYDROCHLORIDE			
943	3/5/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
3418	3/5/2018	100	27808-0092-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
5236	3/5/2018	100	00093-5562-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
1479	3/5/2018	200	00406-3244-01	HYDROMORPHONE HYDROCHLORIDE			
5692	3/5/2018	300	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
290	3/5/2018	400	00406-5771-01	METHADONE HYDROCHLORIDE			
458	3/5/2018	200	00406-5771-01	METHADONE HYDROCHLORIDE			
2587	3/5/2018	200	00406-3249-01	HYDROMORPHONE HYDROCHLORIDE			
5044	3/5/2018	200	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
5463	3/5/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
641	3/5/2018	100	00054-0235-25	Morphine Sulfate			
7181	3/5/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
1890	3/5/2018	100	00093-5551-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
1542	3/5/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE			
1790	3/5/2018	100	00406-5771-01	METHADONE HYDROCHLORIDE			

5064	3/5/2018	100	00093-5554-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
1510	3/5/2018	200	00555-0974-02	Amphetamine-Dextroamphetamine
1537	3/5/2018	100	27808-0093-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
4611	3/5/2018	200	00781-2685-01	DEXMETHYLPHENIDATE HYDROCHLORIDE
986	3/5/2018	200	00406-3243-01	HYDROMORPHONE HYDROCHLORIDE
812	3/5/2018	100	00406-0512-01	OXYCODONE HYDROCHLORIDE